

# **EXHIBIT Z**

JAN. 30. 2008 1:01PM

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Jeffrey A. Worthe, Esq.  
Worthe, Hanson & Worthe  
1851 East First Street, Suite 900  
Santa Ana, California 92705

Re: *All Nippon Airlines v. United Air Lines, Inc.*  
C&F File No.: 9011.05901

Dear Jeff:

Further to our meet-and-confer on January 23, 2008, and January 24, 2008, this will confirm that United Air Lines (UAL) has agreed to the following:

1. UAL will produce all documents in its possession, custody, or control relating to the IATA Standard Ground Handling Agreement ("SGHA") in effect on October 7, 2003, including all documents pertaining to the negotiation of the SGHA;
2. UAL will produce the complete employment files for the captain, first officer, relief pilot and tug driver, including, but not limited to, all training documents UAL has in its possession, custody, or control;
3. UAL will either withdraw its assertion of the self-critical analysis privilege or produce a privilege log identifying which documents UAL is withholding based on the asserted privilege;
4. UAL will produce (in electronic or hard copy format) all "Sky Net" documents relating to the subject accident, as identified during the depositions of the UAL pilots;
5. UAL will consider producing the file which Captain John Reniger testified he has at his home, containing drafts of his statement regarding the subject accident. If a computer expert is required for retrieval, we offer to identify and pay for such service;

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6. UAL will produce the analysis of the urine sample for Edward Loh; and
7. UAL will produce the flight plan for UAL 809 on October 7, 2003, and as reviewed by the flight crew on January 21, 2008, at SFO.

As you are aware, the deposition of UAL's PMK regarding the SGHA is scheduled for next week, on February 5, 2008, in Chicago. Accordingly, we would be grateful if you would produce the documents with respect to the SGHA no later than February 1, 2008, via facsimile or e-mail, so that we can review those documents in preparation for the deposition.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



Scott D. Cunningham

SDC/el

cc: Marshall S. Turner, Esq.  
Scott R. Torpey, Esq. (via facsimile: 248-351-3082)

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